

Data Protection Procedure List of Media-Saturn-Holding GmbH

1) Name of the responsible entity (Data Controller)

Media-Saturn-Holding GmbH (hereinafter also the "Company")

2) Managing boards, managing directors or other lawfully or constitutionally appointed managers and the persons placed in charge of data processing

Directors: Horst Norberg (chairman), Dr. Rolf Hagemann (vice chairman), Jaroslaw Drabarek, Pieter August Haas, Wolfgang Kirsch, Frank Kretzschmar, Joachim Rösger, Ralph Spangenberg

Persons in charge of data processing: Horst Norberg and Dr. Rolf Hagemann

3) Address of the controller

Wankelstrasse 5
D-85046 Ingolstadt / Germany

4) Purposes of collecting, processing or using data

The Company's objects include asset management, the acquisition of interest in corporations of any kind as well as the provision of management, operating control and other services.

The Company collects, processes, and uses data for its own purposes of:

- personnel development, planning, controlling and administration including payroll accounting as well as performance of social insurance payment and other statutory duties;
- internal controlling;
- legal matters;
- internal communication between staff members;
- external communication with interested parties, business partners and other communication partners.

In addition, the Media-Saturn-Holding GmbH processes personal data on behalf of affiliate companies within the meaning of Sections 15 seq. of the German Stock Corporation Act (AktG). Such data processing is not subject of this register of data processing. The duty to issue and maintain the registers of data processing for such data rests with the principal.

5) Description of the group of persons concerned and the data or data categories collected on them

The staff members of Media-Saturn-Holding GmbH as well as candidates, apprentices, trainees, former staff members and their dependents:

Personal data (including name, address, personnel number, nationality, date of birth, information on their qualification, date of joining and leaving the Company, payroll data, data concerning pension schemes and social insurance, job applications, employment certificates, warnings, salary data, bank account data)

The aforementioned persons as well as interested parties, suppliers, business partners:

Contact and communication data (including name, address, phone and fax number, e-mail addresses, employer and position, e-mails)

6) Recipients or categories of recipients to whom the data may be transferred

Internal departments involved in the business processes concerned, to the extent that the disclosure is needed for the performance of their tasks, including, but not limited to:

Human resources department, superiors, internal controlling, legal department

Public and private bodies in accordance with the applicable statutory provisions and subject to the consent of the persons concerned:

Banks, creditors, social insurance carriers, tax offices, police and other security authorities, public prosecutors and courts.

External contractors (data processors on behalf) within the meaning of Section 11 of the German Data Protection Act (BDSG).

7) Standard periods for the erasure of data

The data will be erased or blocked from access after lapse or fulfillment of the purpose for which they were collected. If blocked, the data will be erased as soon as no duties of archiving under any statutes, contracts or the Company's articles of incorporation oppose such erasure, and/or there is no reason to assume any longer that such erasure would impair any interest worth being protected of the person concerned and such erasure does not cause unreasonable costs because of the particular mode of storage of the data.

8) Planned data transfer to third countries

Subject to the consent of the persons concerned and the statutorily provided exceptions: The data will be transferred to affiliate companies (within the meaning of Section 15 seq. AktG) in Russia, Switzerland, Turkey, PRC .

No transfer to other third countries is planned.

Ingolstadt, October 2011



Dietmar Böhlke

Data Protection Officer